

## **Exhibit B**

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JOSHUA SANTIAGO, individually and on  
behalf of similarly situated individuals,

*Plaintiff,*

v.

TESLA, INC., a Delaware corporation

*Defendant.*

Civil Action No. 1:23-cv-02891

**DECLARATION OF RAYMOND KIM**

I, RAYMOND KIM, hereby declare pursuant to 28 U.S.C. § 1746:

1. I am over eighteen years of age. I am aware of the following based on my own personal knowledge and my review of relevant documents.

2. I am a Staff Business Resolution partner in Service Program & Project Management. (“Tesla”), where I have been employed for more than 9 years. In my position, I am familiar with the service, sales, and leasing of Tesla vehicles, including the creation and maintenance of related records.

3. Plaintiff’s Complaint alleges that he purchased a 2020 Tesla Model 3 vehicle. The research into our internal systems indicates that the average purchase price for a 2020 Tesla Model 3 vehicle delivered in Illinois is \$41,352. The average used price of a 2020 Model 3 Standard Range in 2021 in Illinois was approximately \$45,756.

4. Tesla’s records further reflect that since October of 2014, Tesla has sold approximately 1,784,573 new Tesla vehicles in the United States with the installed hardware to

enable a forward collision warning system in the United States. In 2022 alone, Tesla delivered or leased approximately 508,300 vehicles in the United States.

5. I am also familiar with Tesla's state of incorporation and the location of Tesla's principal place of business. Tesla is incorporated under the laws of the state of Delaware and has its principal place of business in Austin, Texas. Since December 1, 2021, Tesla's principal place of business has been located in Texas, and its officers direct, control, and coordinate Tesla's corporate activities from that location.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 8th day of May 2023, in Los Angeles, California

By:   
RAYMOND KIM